

Fifteen years ago I worked for a company that designed, manufactured, and sold a line of building control systems that utilized power lines as a method to carry building control automation signals, known as Power Line Carrier (PLC). It was easy to hear the fourth harmonic of PLC signals on a small AM radio within a building or any building that shared the same side of the power transformer. I am not an expert and have not worked with PLC in many years, but I can tell you that these devices generated radio frequency energy in the HF radio spectrum within a few hundred feet. BPL is the same type of device with a much broader frequency capability and that greatly concerns me.

I am concerned that BPL has the potential to flood the HF radio spectrum with interfering signals that would hinder the valuable role that Amateur Radio provides in our post 9/11 world. Radio Amateurs, like myself, are already living with interference from Electronic Ignition devices, lamp controllers, and heat controllers for water beds and heating pads from our innocent neighbors who have no idea that these devices generate radio interference, and the manufacturers of these devices who could care less about how these devices muddy up the radio spectrum. I'm a witness to the S9 signals I receive on HF from my neighbors heating pad, and believe me that one took some time to chase down. Do we really want to limit the communication abilities of Radio Amateurs in our communities, sometimes in an emergency, due to the widespread "allowance" of these wideband radio frequency generators in our communities?

I plead with the FCC to reconsider allowing BPL to be introduced into the American power system without extensive field-testing. At a minimum, I ask that these devices under go extensive field-testing, and the ARRL (representing Radio Amateurs) and other HF spectrum users be involved in field tests to fully understand and mitigate the impact BPL may have on the radio spectrum.

In addition, I feel that if I as a user of a device that meets Part 15 rules must not cause harmful interference, so must any other unlicensed emitter not cause harmful interference to authorized radio services, including the Amateur Radio Service. BPL must also follow these rules, and the rules must not be altered to allow an interfering device. At a minimum, the rules could allow BPL to be regulated to a narrow frequency band that would not interfere with authorized radio services; and the rules would clearly define the penalties BPL manufactures and user's would be assessed if their devices do interfere with authorized radio services, including the Amateur Radio spectrum.